



RICARDO SOLANO JR.
rsolano@fklaw.com
973.877.6421

May 26, 2016

BY ECF

Hon. Karen M. Williams, U.S.M.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

Re: *Freedom Mortgage Corporation v. LoanCare, LLC*,
1:16-cv-02569-RMB-KMW

Dear Judge Williams:

This firm, along with Boies, Schiller & Flexner LLP, represent defendant LoanCare, LLC in the above-referenced action. We are writing to respectfully request a twenty-day extension of time in order to afford LoanCare sufficient time to answer or otherwise respond to the complaint filed in this action. Plaintiff, through counsel, has consented to this request for extension.

The complaint was filed on May 6, 2016, and served on May 11, 2016. Defendant's answer is currently due on June 1, 2016. This application, therefore, is being submitted prior to the expiration of the time to answer or otherwise respond. Furthermore, no prior extensions of time have been sought or granted. If this request is granted, Defendant's time to answer or otherwise respond to the complaint will be extended to June 21, 2016.

Thank you for your attention to this matter. For the Court's convenience, if this request meets with your approval, I have included a "So Ordered" signature line below. If Your Honor would prefer a formal proposed order setting forth the extension, please let me know and we will submit one immediately.

Respectfully submitted,

s/ Ricardo Solano Jr.
Ricardo Solano Jr.

cc: Jerry A. Cuomo, Esq.

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SO ORDERED:

DATED: May __, 2016

Hon. Karen M. Williams, U.S.M.J.